

1. Historical documents from various state and federal agencies seem to be inconsistent when it comes to characterizing what radioactive waste was dumped at the West Lake Landfill. How confident is the EPA in its original characterization of the site, and can you confirm the details of that characterization? Have they changed since the 2008 ROD?

EPA Response: The original Remedial Investigation (RI) performed by the potentially responsible parties (PRPs) with EPA oversight identified two areas in the West Lake Landfill impacted by radiological materials, currently known as OU-1, Areas 1 and 2. Since that time analysis of the additional data collected has demonstrated the need for further characterization of the radiologically impacted material (RIM). In response, EPA has directed the responsible parties to perform an additional round of site characterization to address identified data deficiencies. EPA is overseeing this additional work. The data that will be collected from this effort will augment the existing site data collected during the original RI and help inform EPA in the long-term remedy decision making process.

2. Recent tests and investigations claim to have found evidence that radioactive waste or materials may be beyond the boundaries of the West Lake Landfill (for example, waste found in other places within the landfill complex, positive tests conducted by residents, and researchers saying radioactive particles have migrated into the groundwater). How is it that the EPA can continue to maintain that radioactive materials have not migrated from the West Lake Landfill, which has no lining or cover?

EPA Response: There is no credible scientific data indicating off-site human exposure to radiological contaminants from the West Lake Landfill. Off-site investigations by EPA have demonstrated that the RIM within the OU1 portion of the West Lake Landfill Superfund Site remains contained. Some of these investigations include the ASPECT plane overflight in 2013 and the Pre-CERCLIS Screening of the Bridgeton Municipal Athletic Complex in 2014. Uncertainties with regard to groundwater impact still merit further investigation as identified by the US Geological Survey's 2014 background groundwater quality review. If off-site contamination of the groundwater exists, there is currently no documented evidence of exposure to that groundwater nor definitive confirmation of the radium source.

3. Critics and concerned residents maintain that — given the rapid pace at which the Bridgeton/West Lake Landfill situation is moving — the EPA may not be the best agency to handle the site. How can the EPA reassure residents that this is not true?

EPA Response: Transfer of the West Lake Landfill site to another federal entity requires congressional action. In accordance with existing federal statutes, EPA is the designated agency with the authority to ensure remediation of the West Lake Landfill Superfund Site. EPA Region 7 routinely coordinates its efforts at the site with federal, state, and local partner agencies, such as United States Army Corps of Engineers, the Missouri Department of Natural Resources, the Missouri Department of Health and Senior Services, and local first responder organizations, to ensure site remediation is performed in accordance with CERCLA Law.

4. Given that the radioactive waste was dumped at West Lake Landfill illegally at a facility for which it was not designed, why has the policy been to contain the waste instead of move it?

EPA Response: To be clear, at the time the radioactive materials were placed in the West Lake Landfill there were not applicable laws preventing it. EPA has followed the Comprehensive Environmental Response, Compensation and Liabilities Act (CERCLA) process for remedy selection at the site and has

documented this action in the 2008 Record of Decision (ROD) and associated administrative record. The 2008 ROD identified the selected remedy as installation of a landfill cover that meets all applicable federal and state requirements, along with specified site monitoring and institutional controls as the remedy after the site RI and Feasibility Study. The criteria for this selection are outlined in the ROD, which is available at the following link: [insert link]. Following extensive public availability and comment, this remedy selection was further evaluated in the 2011 Supplemental Feasibility Study. EPA Region 7 is currently reviewing additional remedial options to determine if modification of the 2008 ROD is warranted.